

United States District Court

United States

vs

Angel DeLeon, et al.

Case No. 15-CR-4268-JB

Motion to Quash Subpoena's as per Rule 17(c) (2) of Criminal Procedure.

1. Subpoenas were too delivered to Jim Moore and Cheryl Lackey-Moore on March 7, 2018 by the US Marshal in Oklahoma at Davis Field Convenience Store by Muskogee, Oklahoma.
2. Trail is set to start in Las Cruces, New Mexico on March 12, 2018 at 9:00am.

Jim and Cheryl Moore respectfully request the Subpoena's be Quashed based upon the following:

Their young Son who is 4 years old has Autism and is Non-Verbal requiring constant care. He is in specialized speech/occupational therapy and school 5 days a week. There is not ample time to find a care person for him in Oklahoma or in Las Cruces, New Mexico to provide him with the Specialized Care and Supervision he requires.

The Financial Burden to travel 15hours from Stigler, Oklahoma to Las Cruces, New Mexico and make accommodations is beyond their means and would have to borrowed from friends.

Cheryl Lackey-Moore is also the caregiver for her Elderly Parents who reside in the home as she cooks and cleans for them. Someone will have to be paid to assist them in her absence.

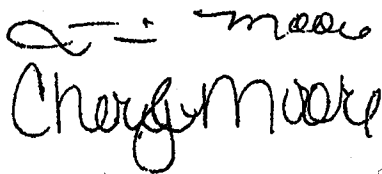
Jim and Cheryl have a family pet that had Emergency Surgery on March 7, 2018 that requires post operational care (antibiotics, surgical site/stitches care). This emergency expense is a contributing factor as to why they are short on funds. This was the same day the Subpoenas were served. The pet would have to be returned to the Vet for care creating more expense.

Jim Moore has contacted the witness coordinator and expressed these concerns to her and suggested a Phone conference/testimony call would be more helpful. As of this time no response has been given.

Jim and Cheryl thank the court for their time and pray the court grants this motion at this time.

Respectfully submitted:

Jim and Cheryl Moore

 Cheryl Moore

AO 89 (Rev. 08/09) Subpoena to Testify at a Hearing or Trial in a Criminal Case

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America

v.

Angel Deleon, et al.

Defendant

Case No. 15-CR-4268-JB

08 FEB 26 PM 5:59

SUBPOENA TO TESTIFY AT A HEARING OR TRIAL IN A CRIMINAL CASE

To: Cheryl Lackey
 31213 West Beaver Mountain Road
 Stigler, OK 74462

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place shown below to testify in this criminal case. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place of Appearance: US District Court Las Cruces, NM	Courtroom No.: 320 - Tortugas
	Date and Time: 3/12/2018-3/16/2018, 9:00 AM

You must also bring with you the following documents, electronically stored information, or objects (blank if not applicable):

Please bring with you two copies of all documents you have authored regarding the investigation into the deaths of Freddie Sanchez, Rolando Garza, and Frank Castillo and any file maintained by you in any form whether it be a personal file, an STIU file, an investigative file or a file of any other name.

(SEAL)

Date: 2.23.18

CLERK OF COURT

Victoria Harwell

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) _____, who requests this subpoena, are:

Billy Garcia

Robert Cooper
 Robert R. Cooper Law Firm, P.C.
 1011 Lomas Blvd. NW
 Albuquerque, NM 87102
 bob@rrcooper.com
 505-842-8494

James Castle
 Castle & Castle, P.C.
 1544 Race Street
 Denver, CO 80206
 jcastlelaw@gmail.com
 303-675-0500

CASTLE & CASTLE, P.C.

1544 Race Street
Denver, CO 80206
(303) 675-0500
F: (303) 329-5500

James Andrew Castle
Lisabeth Perez Castle

February 23, 2018

To Whom It May Concern:

You have been subpoenaed for the entire week of March 12-16, 2018. It is anticipated your testimony will take place one of those days, but which day has not been determined at this time.

If you wish to be provided with a specific date for attendance, please contact defense witness coordinator, Laura Koch, at 303-263-1483 or by email at paralegal.LOS@gmail.com. Otherwise, please appear on March 12, 2018 at 9:00 AM and you will be informed at that time when to reappear.

Thank you,

Jim Castle
Attorney for Billy Garcia

From: (07) Stigler Public Lit Fax: (866) 696-7978

To:

Fax: (575) 528-1425

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FAX**Date:** 03/08/2018**Pages including cover sheet:**

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Web Page: www.oklibrary.net

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US DISTRICT COURT

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CLERKS OFFICE

FAX #

575-528-1425

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MOTION FOR QUASH**FROM**

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Jim Moore

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FAX 575-528-1425

To:

United States District Court Clerk's Office

Las Cruces, New Mexico

From:

Jim Moore

Cheryl Lackey-Moore

580-212-9428

Please send stamped received
copy by email to k9astab1@msn.com
if you can as we have no fax at home.
OR

teamroperx2@msn.com